

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP**

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*PROPOSED SPECIAL COUNSEL FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO  
COMPLAINT and JOHN AND JANE DOES 1-  
1000,

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No.: 23-01092 (MBK)

**NOTICE OF APPEARANCE IN ADVERSARY PROCEEDING**

**PLEASE TAKE NOTICE** that pursuant to section 1109 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, LTL Management LLC, Plaintiff in the above-captioned adversary proceeding, appears through its proposed special counsel, Skadden, Arps, Slate, Meagher & Flom

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

LLP, and requests service of all notices and documents herein upon:

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

Allison M. Brown, Esq.  
One Manhattan West  
New York, New York 10001  
Telephone: (212) 735-3222  
Facsimile: (917) 777-3222

Counsel also requests that all ECF/electronic notices be sent to [Allison.Brown@skadden.com](mailto:Allison.Brown@skadden.com).

**PLEASE TAKE FURTHER NOTICE** that the foregoing request for service includes all pleadings of any kind, including, without limitation, all notices, applications, motions, complaints, and orders, whether written or oral, formal or informal, however transmitted or conveyed, related in any way to the above-captioned Plaintiff, its property, or its estate.

**PLEASE TAKE FURTHER NOTICE** that neither this *Notice of Appearance in Adversary Proceeding* (the “Notice”) nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in noncore matters entered only after *de novo* review by a District Judge, (ii) the right to trial by jury in any proceeding triable in these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (v) an election of remedies, or (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 10, 2023

Respectfully submitted,

**SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP**

/s/ Allison M. Brown

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*Proposed Special Counsel for LTL Management LLC*